

**EXHIBIT 7**

**FILED UNDER SEAL**

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA  
3 SAN FRANCISCO DIVISION

4  
5 WAYMO LLC, )  
6 Plaintiff, )  
7 vs. ) Case No.  
8 UBER TECHNOLOGIES, INC., ) 3:17-cv-00939-WHA  
9 OTTOMOTTO LLC; OTTO )  
10 TRUCKING LLC, )  
11 Defendants. )  
12  
13  
14  
15 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY  
16 VIDEOTAPED DEPOSITION OF PIERRE-YVES DROZ  
17 San Francisco, California  
18 Friday, March 31, 2017  
19 Volume I  
20  
21  
22  
23 Reported by: SUZANNE F. GUDELJ  
24 CSR No. 5111  
25 Job No. 2581643  
26 PAGES 1 - 187

1 8.5 degrees. That's basically those red lines on  
2 the drawings.

3 Q If you look at the spec sheet, the  
4 Exhibit 1019 --

5 A Mm-hmm. 09:53:39

6 Q -- it says it uses 64 LiDAR channels. Do  
7 you see that?

8 A I see that.

9 Q And that's the HDL-64. Does 64 refer to  
10 the number of LiDAR channels? 09:53:50

11 A That's what I think.

12 Q And 64 LiDAR channels corresponds to 64  
13 diode lasers?

14 MR. JAFFE: Objection. Form.

15 THE WITNESS: I mean, 64 channels, there's 09:54:03  
16 different ways to implement that, and there's  
17 different ways to implement 64 channel LiDARs.

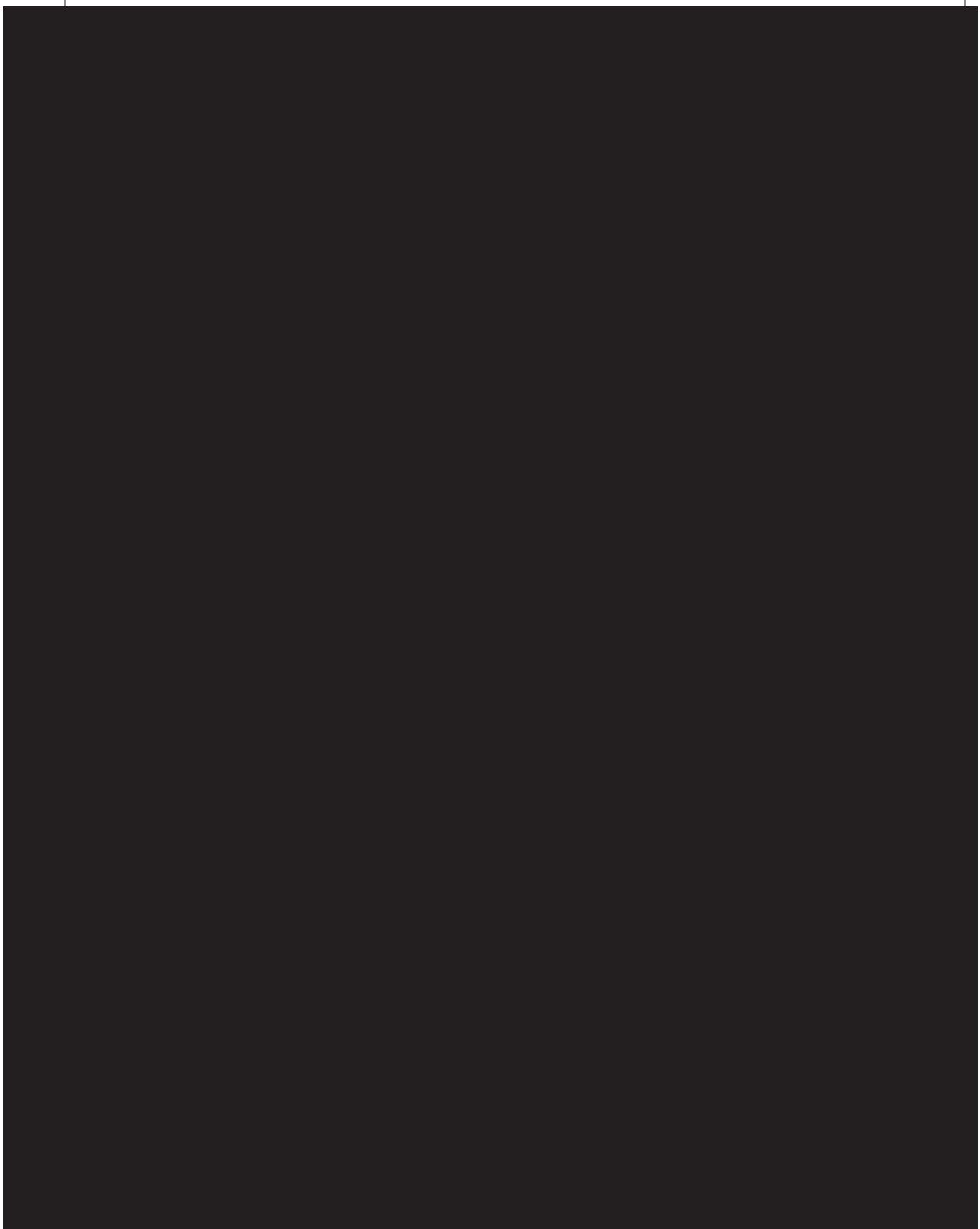
18 BY MR. JACOBS:

19 Q How did Velodyne implement 64 LiDAR  
20 channels? 09:54:17

21 MR. JAFFE: Objection. Form.

22 THE WITNESS: Can you like refer to a  
23 specific device? Because, I mean, I don't know  
24 about everything that Velodyne makes.

25 BY MR. JACOBS: 09:54:25







16 A Yes.

17 Q Let me ask you a couple of questions about  
18 510 Systems.

1 Again, just 'cause of the territory we're in, I'm  
2 going to caution you not to reveal the content of  
3 any attorney-client privileged information.

4 THE WITNESS: So I've seen -- like what  
5 I've seen from the -- from this board, it had a lot 02:35:18  
6 of elements, you know, very like similar to our  
7 boards. The -- I understand that -- that Anthony  
8 like downloaded those files, and so the -- with  
9 those elements on it. As to knowing exactly how  
10 like one PCB or not became the other, I'm not -- you 02:35:41  
11 know, that would be speculation. I don't know  
12 like...

13 BY MR. JACOBS:

14 Q Are you aware of any other evidence that  
15 the 14,000 allegedly downloaded files were used at 02:35:55  
16 Uber?

17 MR. JAFFE: Object to form. Again, same  
18 caution about privileged information.

19 THE WITNESS: I mean -- also mean -- you  
20 know, I don't have direct information that would, 02:36:20  
21 like that would say that. The -- the rest -- you  
22 know, these are speculation that's (inaudible).

23 That's -- like some information that I've  
24 seen, you know, could -- maybe I could speculate  
25 that -- that -- like, you know, what we -- I just 02:36:39

1 Q I asked you about how -- what information  
2 they give you -- sorry, what information you have  
3 that suggests that the files may have been used in  
4 the creation of that circuit board.

5 A Mm-hmm. 02:38:24

6 Q Set that aside.

7 A Yes.

8 Q Do you have any other information that  
9 bears on the question whether Uber is using any of  
10 Waymo's trade secrets? 02:38:32

11 MR. JAFFE: I'm going to object to form,  
12 and then same caution again not to reveal the  
13 content of any attorney-client communications.

14 THE WITNESS: Not that I can think of.

15 BY MR. JACOBS: 02:38:43

16 Q On the -- we talked earlier about the dome  
17 that -- that covers the LiDAR when the LiDAR is  
18 deployed on a field vehicle -- on a vehicle in the  
19 field.

20 A Mm-hmm. 02:38:54

21 Q Can that dome be seen through under any  
22 circumstances?

23 A That dome is actually transparent in the  
24 infrared bands.

25 (Reporter clarification.)

1                   I, the undersigned, a Certified Shorthand  
2 Reporter of the State of California, do hereby  
3 certify:

4                   That the foregoing proceedings were taken  
5 before me at the time and place herein set forth;  
6 that any witnesses in the foregoing proceedings,  
7 prior to testifying, were duly sworn; that a record  
8 of the proceedings was made by me using machine  
9 shorthand which was thereafter transcribed under my  
10 direction; that the foregoing transcript is a true  
11 record of the testimony given.

12                  Further, that if the foregoing pertains to  
13 the original transcript of a deposition in a Federal  
14 Case, before completion of the proceedings, review  
15 of the transcript [X] was [ ] was not requested.

16                  I further, certify I am neither financially  
17 interested in the action nor a relative or employee  
18 of any attorney or party to this action.

19                  IN WITNESS WHEREOF, I have this date  
20 subscribed my name.

21                  Dated: 4/3/17

22                  Suzanne F. Gudelj

23                  SUZANNE F. GUDELJ

24                  CSR No. 5111